

Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter Of                    )  
  )  
  )  
  )                   RM-11347  
Petition for Proposed                )  
Changes in 47 CFR Part 97         )  
Section §97.119                     )

TO: The Commission

Comment on Petition by Glen E. Zook, ARS K9STH

I agree in principle with Petitioner's desire to improve and enforce 47 CFR §97.119(a), which as currently written requires amateur radio stations to "transmit its assigned call sign on its transmitting channel at the end of each communication, and at least every 10 minutes during a communication". However, I must oppose the implementation proposed in the above-captioned petition.

I specifically oppose Petitioner's proposal to modify 47 CFR §97.119a by inserting a requirement that stations transmit their call sign at both the beginning and end of each single transmission. To place such a requirement on an operator would be contrary to good amateur radio practice, specifically in maintaining brevity of transmissions and communications. As an example, under Petitioner's proposal, a station may be required to initiate a general request for a contact with another station by saying or sending:

"This is WA1XYZ calling CQ, CQ, CQ, this is WA1XYZ."

Similar unnecessary burdens would be placed on operators during contest operation, roundtable discussions or traffic nets, and so forth.

Therefore, I urge the Commission to REJECT Petition RM-11347, and maintain 47 CFR §97.119 as currently published.

Respectfully submitted,

ALAN W. JUMP  
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